

Roger W. Bailey
Joshua J. Busey
BAILEY & BUSEY PLLC
411 N. 2nd Street
Yakima, Washington 98901

Phone: 509.248.4282
Facsimile: 509.575.5661
E-Mail: roger.bailey.attorney@gmail.com
joshua.busey.attorney@gmail.com

Attorneys for the Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

IN RE:

WAHLUKE PRODUCE, INC.,

Debtor.

Case No. 16-00899

Case No. 16-00900

Case No. 16-00898

NOTICE OF INTENT TO
COMPENSATE INSIDERS

IN RE:

TATOES, LLC,

Debtor.

IN RE:

COLUMBIA MANUFACTURING,



411 North 2nd St.

**NOTICE OF INTENT
TO COMPENSATE**

Yakima, Washington, 98901

1 INC., dba COLUMBIA ONION

2
3 Debtor.

4
5 TO: The United States Trustee

6
7 AND TO: The Master Mailing List

8
9 PLEASE TAKE NOTICE that Wahluke Produce, Inc. ("**Wahluke**"),
10
11 Tatoes, LLC ("**Tatoes**"), and Columbia Manufacturing, Inc. d/b/a Columbia
12
13 Onion ("**Columbia**"), jointly as the Debtors-in-Possession, intend to
14
15 compensate insiders during the pendency of this case, pursuant to the schedule
16
17 attached hereto as Exhibit 1 ("**Compensation Schedule**"). In accordance
18
19 with LBR 3016-1(d)(2), the Compensation Schedule summarizes the amount
20
21 of compensation to be paid, to whom said compensation shall be paid, the
22
23 amount of compensation paid over the past twelve (12) months, and the
24
25 function of each individual receiving compensation.

26
27 The Compensation Schedule lists the annual salary for each of the
28
29 insiders. In accordance with historical practices, it is the intent of the Debtors-
30
31 in-Possession to pay the annual salary to each of the insiders on a pro rata bi-
32
33 weekly basis (1/26 of the annual salary every two-weeks). Each of the
34

BAILEY  BUSEY
411 North 2nd St.

NOTICE OF INTENT
TO COMPENSATE

Yakima, Washington, 98901

1 insiders historically has performed work for each of the Debtors-in-Possession
2 as part of their job functions and responsibilities. The intent and anticipation
3 is that this will continue post-petition.
4

5
6 Pursuant to LBR 3016-1(c)(3):
7

8 Compensation may commence after notice is given. Any party in
9 interest objecting to the compensation shall do so in writing, and has the
10 duty to request a hearing on the objection. The compensation shall
11 continue until the Court orders otherwise. The Court shall provide an
12 expedited hearing on the objection. If the Court rules that the amount
13 received prior to the hearing is excessive, it may order disgorgement of
14 funds back to the estate.

15 NOTICE IS HEREBY GIVEN that objections to the above Notice may
16 be made at any time prior to confirmation, must be in writing, must be filed
17 with the Clerk of the United State Bankruptcy Court, 402 E. Yakima Avenue,
18 Suite 200, Yakima WA, 98901 and must be served on the undersigned
19 counsel.
20
21
22
23

24 Pursuant to LBR 2002-1(f)(1) and (2), any objection shall state briefly
25 the grounds therefore. If an objection states no grounds, the Court may strike
26 the objection on the ex parte motion of the moving party. The moving party,
27 however, may make such ex parte motion to strike only after the objection
28 party fails within seven (7) days, to respond to a request by the moving party
29
30
31
32
33
34



NOTICE OF INTENT
TO COMPENSATE

Yakima, Washington, 98901

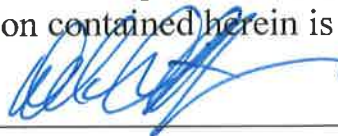
1 for a brief statement of the grounds for the objection. If an objection is filed,
2
3 and a hearing is set, the opposing party must comply with LBR 9073-1(d),
4
5 which state, in part, that an opposing party shall serve and file any objection,
6
7 counter-affidavits, or statements under penalty of perjury or other responding
8
9 documents no more than three (3) days prior to the hearing on the application
10
11 or motion.

12 DATED this 21 day of March, 2016.

13
14 

15 ROGER W. BAILEY (WSBA 26121)
16 JOSHUA J. BUSEY (WSBA 34312)
17 Bailey & Busey PLLC
18 Counsel for Elite Nursing, PLLC
19
20

21 I, Del Christensen, member of Tatoes, and president of Columbia and
22 Wahluke, have read the foregoing, including the Schedule of Compensation
23 and hereby certify that the information contained herein is true and correct.
24

25 

26 Del Christensen
27
28
29
30
31
32
33
34


411 North 2nd St.

NOTICE OF INTENT
TO COMPENSATE

Yakima, Washington, 98901

Brief Job Description for each Family Member...

Del Alan Christensen, Owner

Annual Salary - \$30,000 (down from \$120,000)

Compensation 2015 – W2 \$99,448.20

Company Vehicle – yes

Retirement Contributions – 2015 \$3071.54 2016 \$0

Health Insurance – yes

Daneen Elaine Christensen, Owner

Office Manager, Payroll Clerk, Human Resources

Annual Salary – \$0 (down from \$17,550.72)

Compensation 2015 – W2 \$17,550.72

Company Vehicle – yes

Retirement Contributions – 2015 \$526.56 2016 \$0

Health Insurance – yes

Dean Alan Christensen

Numbers, all companies; manager at Saddle Mountain Wireless

Annual Salary - \$50,000 (down from \$130,000)

Compensation 2015 – W2 \$128,536.78

Company Vehicle – no

Retirement Contributions – 2015 \$0 2016 \$0

Health Insurance – yes

D Alex Christensen

Project managers for all companies

Annual Salary - \$60,000 (down from \$100,000)

Compensation 2015 – W2 \$93,600.83

Company Vehicle – yes

Retirement Contributions – 2015 \$2792.31 2016 \$0

Health Insurance – yes

Dallon A Christensen

Tatoes, LLC Manager

Annual Salary - \$50,000 (down from \$80,000)

Compensation 2015 – W2 \$58,639.39

Company Vehicle – no

Retirement Contributions – 2015 \$0 2016 \$0

Health Insurance – yes

Damon Aiken Christensen

Student at University of Idaho, graduating in May with an Ag degree

Will be home to farm in May

Annual Salary – \$39,428.10

Compensation 2015 – W2 \$39,428.10

Company Vehicle – yes

Retirement/Education Fund Contributions – 2015 \$0 2016 \$0

Health Insurance – yes

Dexter Alden Christensen

Farm Laborer

Annual Salary – \$31,250.04

Compensation 2015 – W2 \$31,250.04

Company Vehicle – no

Retirement/Education Fund Contributions – 2015 \$894.02 2016 \$0

Health Insurance – yes

In December we made drastic cuts to our family payroll and in our upper management's payroll.

Other compensation offered to family are vehicle insurance, fuel, and cellphones.